

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on December 1, 2017 at 2:30 p.m., or as soon
3 thereafter as this matter may be heard before the Honorable Josephine L. Staton, in
4 Courtroom 10A on the 10th Floor of the Ronald Reagan Federal Building and United
5 States Courthouse, 411 W. Fourth St., Santa Ana California, 92701, Plaintiff will move,
6 and hereby does move pursuant to Rule 65 of the Federal Rules of Civil Procedure and
7 Cal. Civ. Proc. Code § 527.6 for an preliminary injunction order enjoining Defendant
8 from future harassing conduct against Plaintiff.

9 The grounds for this motion are that Defendant has been engaging in a knowing
10 and willful course of harassing conduct against Plaintiff that is resulting in severe
11 emotional distress. The conduct is ongoing, is not protected, and will continue absent
12 court intervention.

13 This motion is based on this notice of motion and motion; the accompanying
14 memorandum of points and authorities; the Declaration of Chris Principe; the record in
15 this action; and any other papers, evidence, and argument as may be submitted in
16 connection with the motion.

17 Pursuant to Local Civil Rule 7-3, no conference of counsel is necessary because
18 Plaintiff is moving for a preliminary injunction; Plaintiff has given Defendant notice of
19 his intent to bring this motion.

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21 DATED: October 20, 2017

Tucker Ellis LLP

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23 By: /s/Steven E. Lauridsen

24 Howard A. Kroll
25 Steven E. Lauridsen

26 Attorneys for Plaintiff
27 CHRIS PRINCIPE
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